

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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US BANK NATIONAL ASSOCIATION, AS  
TRUSTEE FOR THE SPECIALTY  
UNDERWRITING AND RESIDENTIAL  
FINANCE TRUST AND MORTGAGE LOAN  
ASSET-BACKED CERTIFICATES SERIES  
2006-BC4,

Plaintiff,

vs.

WOODLAND VILLAGE; WESTLAND REAL  
ESTATE DEVELOPMENT AND  
INVESTMENTS; THUNDER PROPERTIES,  
INC.; AND PHIL FRINK & ASSOCIATES,  
INC.,

Defendants.

Case No. 3:16-cv-00501-RCJ-CSD

**STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**  
**(Third Request)**

COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, US BANK  
NATIONAL ASSOCIATION, AS TRUSTEE FOR THE SPECIALTY UNDERWRITING AND  
RESIDENTIAL FINANCE TRUST AND MORTGAGE LOAN ASSET-BACKED  
CERTIFICATES SERIES 2006-BC4, by and through their undersigned counsel, and hereby  
stipulate and agree as follows:

1. Pursuant to this Court's Order dated October 11, 2022 [ECF #63], the parties hereto are to file Motions for Summary Judgment on or before November 7, 2022.
2. The parties continue to discuss settlement and prefer to devote their time and resources to an effort to amicably resolve the instant matter prior to engaging in further litigation. US Bank is presently considering a settlement offer from Defendant and formulating a response. The parties do not expect to be able to fully explore settlement in advance of November 7, 2022.
3. In addition, Defendant's counsel is required to be out of town from November 1, 2022, through November 12, 2022, to attend to personal and family matters.
4. Based upon the foregoing, the parties respectfully request that the deadline to file Motions for Summary Judgment herein be extended for an additional approximately 30 days until December 7, 2022.
5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 25<sup>th</sup> day of October, 2022.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

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**Attorney for Plaintiff**  
**U.S. Bank National Association**

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: November 3, 2022.